12/21/05

To: Core Team

From: H Occupancy Workgroup – South

The H Occupancy Workgroup reviewed the direction provided by the CSFM and the Core Team. Attached are the comments the South Workgroup made to the North Workgroup proposals for the H4, H5 and H8 (Lab) occupancies.

1. **Height and Area**
   Needs to be revisited and will be by a separate group. Concerns listed below.

   Purpose/Rationale:
   - H3 occupancy is more restrictive than current code as you cannot use sprinkler increase.
   - H2 occupancy based on type of construction can be approximately 200% bigger than accepted before. Do we have fire-fighting capabilities? Are fire suppression systems adequately designed for the additional area and potential load?
   - H1 occupancy can be in combustible construction. Why?
   - Additional height – what does this do to future TIs? Planning Zone issue?

2. **Control Areas**
   Understand the change is business friendly, but creates a regulatory nightmare. Will be difficult to regulate and enforce.
   - Quantity limits, construction requirements

3. **Separation Requirements**

IBC Chapter 4, Section 415.7 - Add flammable liquid storage room and warehouse definitions.

Liquid storage rooms. Rooms in which Class I, Class II and Class II-A flammable or combustible liquids are store in closed containers shall be constructed in accordance with the requirements for Group H3 occupancy.

Liquid storage warehouses. Liquid storage warehouses in which Class I, Class II and Class III-A flammable or combustible liquids are stored in closed containers shall be constructed in accordance with the requirements for a Group H3 occupancy.

Purpose/Rationale: Flammable liquid storage rooms and warehouses are often confused and are listed in the IFC. For clarity and consistency, the same definitions should be in the IBC..

IBC Chapter 4, Section 415.8.4 - Add requirements that are missing for separation for H3 and H4 occupancies.

Liquid storage warehouses shall be separated from al other uses by a four-hour separation wall.

Purpose/Rationale: Section 3404.3.8 of the IFC refers you to the IBC and there are no specific requirements for separation of a liquid storage warehouse.

4. HMMP/HMIS

2701.5.1 Hazardous Materials Management Plan. Where required by the fire code official, each application for a permit shall include a Hazardous Materials Management Plan (HMMP). The HMMP shall include a facility site plan designating the following:

1. Storage and use areas.
2. Maximum amount of each material stored or used in each area.
3. Range of container sizes.
4. Locations of emergency isolation and mitigation valves and devices.
5. Product conveying piping containing liquids or gases, other than utility-owned fuel gas lines and low- pressure fuel gas lines.
6. On and off positions of valves for valves that are of the self –indicating type.
7. Storage plan showing the intended storage arrangement, including the location and dimensions of aisles.
8. The location and type of emergency equipment. The plans shall be legible and drawn approximately to scale. Separate distribution systems are allowed to be shown on separate pages.

<u>{For SFM} The HMMP shall comply with Health and Safety Code, Chapter 6.95, Sections 25500 through 25545, and Title 19, Division 2, Chapter 3.</u>

PURPOSE OF CHANGE:
Section 2701.5.2 of the 2006 IFC provides the general guidelines for the submittal of a Hazardous Materials Inventory Statement (HMIS). The Office of the State Fire Marshal is proposing to add the requirement that the HMIS shall also comply with the provisions of the Health and Safety Code and Title 19 to ensure that the HMIS provides the necessary information to comply with the minimum statewide standards for the inventory statement.

2701.5.2 Hazardous Materials Inventory Statement (HMIS). Where required by the fire code official, an applicant for a permit shall include an HMIS, such as SARA (Superfund Amendments and Reauthorization Act of 1986), Title III, Tier II Report, or other approved statement. The HMIS shall include the following information:

1. Manufacturer’s name.
2. Chemical name, trade names, hazardous ingredients.
3. Hazard classification.

4. MSDS or equivalent.
5. United Nations (UN), North America (NA), or the Chemical Abstract Service (CAS) identification number.
6. Maximum quantity stored or used on-site at one time.
7. Storage conditions related to the storage type, temperature and pressure.

{For SFM} The HMIS shall comply with the Health and Safety Code, Chapter 6.95, Sections 25500 through 25545, and Title 19, Division 2, Chapter 3.